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March 29, 2017

Via ECF/CM

The Honorable Edgardo Ramos
United States District Court
for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. El Gammal*, 15-cr-588 (S.D.N.Y.) (ER)

Dear Judge Ramos:

I am one of the two attorneys recently appointed by this Court to represent Mr. Ahmed El Gammal in post-trial proceedings, following his conviction in January of this year. My appointment followed Mr. Donald Duboulay and was intended to ensure that one of Mr. El Gammal's attorneys would have a security clearance allowing review of any classified materials in this case. Since my appointment, I have been working to transfer the file from Mr. El Gammal's prior counsel and have also offered to duplicate all non-classified materials for co-counsel. Unfortunately, the technology services in my office has been slow to duplicate the discovery and we have therefore not yet been able to embark on a meaningful review of the prior proceedings. I am hopeful that within the next two weeks we will all have the documents and discovery in hand and that we can turn to preparing and filing any post-trial motions. To allow adequate time for doing so, I therefore respectfully ask that the currently scheduled deadlines be adjusted by approximately 60 days, with defense motions due June 30, 2017 (instead of April 28, 2017), the government opposition due July 24, 2017 (instead of May 19, 2017), and the defense reply due on August 8, 2017 (instead of June 2, 2017).

This is the first such request for an adjournment since Mr. Duboulay and I were appointed by this Court. The government consents to the request.

Respectfully submitted,

/s/ Megan W. Bennett

cc: All counsel of record via ECF/CM

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